

REMARKS

Claims 1-16 remain in this case for consideration. Claims 1, 2, 8 and 13 have been amended to more clearly define Applicants' invention. Support for Applicants' amendments can be found, among other places, in paragraph [0019] of Applicants' specification and in Applicants' drawings.

A. Prior Art Rejections

1. The Invention

Applicants have invented a computer input/output connector assembly which allows computers to be quickly and easily manufactured in many different variations. In Applicants' preferred embodiment, each of Applicants' input/output connector ports are enclosed in a "clamshell" type connector port holder which encloses through direct contact and protects the delicate region where the connector port is joined to the wire which runs between the connector port and a computer circuit. Each of the connector port holders feature locking tabs which are received into locking tab holes in a computer bracket. The connector port holders are constructed so that when their locking tabs are inserted into the bracket's locking tab holes, the input/output connector portion of the connector port will be correctly received into the bracket's matching port hole.

2. The Cited Art Distinguished

Applicants' claims 1-16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Admitted Prior Art (APA) in view of Freeman's U.S. Patent No. 5,366,388 ("Freeman patent") and Carter's U.S. Patent No. 3,711,817 ("Carter patent"). As Applicants understand it, the so-called Admitted Prior Art referred to by the Examiner simply concerns the general use of personal computer input connections for a keyboard, mouse, joystick, microphone, video feed and, more recently, multi-use universal serial bus ("USB") connectors.

The Freeman patent discloses a wiring distribution system for use in construction of buildings. To help stably mate two electrical connectors together, Freeman teaches that an

internal electrical connector can be placed in a modular coupler sleeve which features a locking tab and a seating tab. These modular coupler locking/seal tabs can then be received into engagement tracks in the aperture of a wall panel to fix the internal electrical connector in place. After construction is complete, an external electrical connector can be attached to the internal electrical connector through the appropriate wall panel aperture.

The Freeman patent differs in several significant respects from Applicants' invention. First of all, unlike Applicants' invention, the Freeman patent is directed to the construction of buildings, rather than the rapid, versatile manufacture of computers and other electrical devices. This important difference in purpose is reflected in the different structures that Freeman and Applicants have chosen. For example, Applicants' locking tabs are received into mating *holes* in Applicants' bracket. If the computer assembler needs to quickly re-orient the arrangement of connector ports in the computer bracket, the computer assembler can do so by using their fingers to press Applicant's locking tabs back through the mating holes and then pull out the connector port and connector port holder which needs to be re-oriented. By contrast, if Freeman's wall panel were filled with modular couplers, there would be insufficient space for a user to try to press in the locking tab with their fingers and remove a particular modular coupler for re-orientation. Instead, a hard to find bladed tool would need to be used to pry open Freeman's locking tab so that Freeman's modular coupler could be removed. Nonetheless, in Freeman's construction application, it is not important that modular couplers be inserted and removed easily and efficiently, so making a modular coupler difficult and onerous to remove is not a problem.

Further, Freeman's modular coupler sleeve has a much different purpose than Applicants' connector port holder. In Applicants' invention, the connector port holder is designed to enclose through direct contact and protect the delicate region where the electrical wire attaches to the connector port. To assemble computers and other electrical devices for Applicants' invention, an electrical wire is typically joined to the connector port by soldering and the connection region is then gently fitted into a receiving cavity formed in a half connector port holder. That half connector port holder is then joined to the other half connector port holder so that the connector port holder will completely enclose through direct contact and protect the

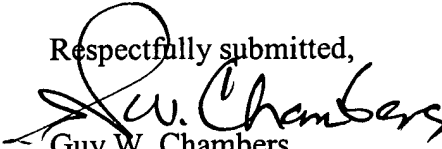
delicate connection region. By contrast, the Freeman patent does not even try to address Applicants' important objective of using the connector port holder to protect the delicate region where the connector port is joined to the wire. Instead, Freeman's modular coupler simply acts as a sleeve to help align two preformed input/output connector ports.

While, unlike the Freeman patent, the Carter patent is in Applicants' field of electrical devices, it too fails to teach the novel aspects of Applicants' invention. More specifically, there is no teaching in the Carter patent of a locking tab on connector port holder which attaches to a locking tab hole on a bracket for easy insertion and removal. Moreover, there is no teaching in the Carter patent of any sort of tab locking connector port holder, much less one which encloses through direct contact and protects the delicate region where a connector port is attached to a wire. Finally, with respect to Applicants' claims 12 and 16, there is no teaching in either the Freeman patent or the Carter patent of a metal tab on the connector port holder which electromagnetically contacts both the connector port and the metal bracket. For these reasons, neither the so-called Admitted Prior Art, Freeman patent nor the Carter patent, either individually or in any combination, render any of Applicants' pending claims unpatentable.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at (415) 576-0200.

Respectfully submitted,


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Attachments
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